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Attorney for Defendant
DAVID HANSEN

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID KENNETH HANSEN,

Defendant.

Case No.: 2:20-cr-021 TLN

STIPULATION AND ORDER
CONTINUING STATUS CONFERENCE
AND EXCLUDING TIME UNDER THE
SPEEDY TRIAL ACT

Date: July 28, 2022
Time: 9:30 a.m.
Court: Hon. Troy L. Nunley

Plaintiff United States of America by and through Assistant United States Attorney James
Conolly, and Attorney Todd Leras on behalf of Defendant David Hansen, stipulate as follows:

1. This matter is presently set for a status conference on July 28, 2022. By this
stipulation, Defendant Hansen moves to continue the status conference to September
15, 2022.

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2. This case involves drug trafficking and firearm charges stemming from execution of search warrants in Sacramento and Placer Counties.
3. The government recently produced supplemental discovery materials, including hundreds of hours of video recordings, downloaded onto an external hard drive provided by defense counsel. These video recordings are so voluminous that they required computer storage space estimated to be more than two terabytes. Defense counsel is continuing to review these materials with Mr. Hansen. The government also provided the terms of a proposed resolution offer to Mr. Hansen.
4. The defense is proceeding with its own investigation based on the supplemental discovery provided by the government. In addition, defense counsel is discussing the proposed settlement agreement with Mr. Hansen. The defense therefore requests additional time to perform its investigation. The additional time is needed to follow up on information contained within the supplemental discovery materials mentioned in the preceding paragraph.
5. Given the ongoing defense investigation, Defendant Hansen requests to continue the status conference in this matter to September 15, 2022, at 9:30 a.m., and to exclude time between July 28, 2022, and September 15, 2022, inclusive, under Local Code T-4. The United States does not oppose this request.
6. Attorney Todd Leras represents and believes that failure to grant additional time as requested would deny Defendant Hansen the reasonable time necessary for effective preparation, considering the exercise of due diligence.
7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, *et*

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1 *seq.*, within which trial must commence, the time period of July 28, 2022 to
2 September 15, 2022, inclusive, is deemed excludable pursuant to 18 U.S.C. §
3 3161(h)(7)(A), and (B) (iv) [Local Code T-4] because it results from a continuance
4 granted by the Court at Defendant Hansen's request on the basis that the ends of
5 justice served by taking such action outweigh the best interest of the public and the
6 Defendant in a speedy trial.
7

- 8 8. Nothing in this stipulation and order shall preclude a finding that other provisions of
9 the Speedy Trial Act dictate that additional time periods are excludable from the
10 period within which a trial must commence.
11

12 Assistant U.S. Attorney James Conolly has reviewed this proposed order and authorized
13 Todd Leras via email to sign it on his behalf.

14 DATED: July 25, 2022

PHILLIP A. TALBERT
United States Attorney

16 By /s/ Todd D. Leras for
17 JAMES CONOLLY
Assistant United States Attorney

18 DATED: July 25, 2022

19 By /s/ Todd D. Leras
20 TODD D. LERAS
Attorney for Defendant
21 DAVID HANSEN
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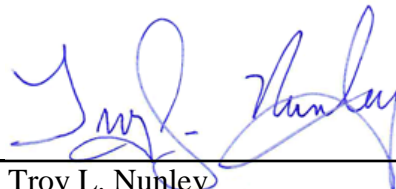
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ORDER

BASED ON THE REPRESENTATIONS AND STIPULATION OF THE PARTIES, it is hereby ordered that the status conference in this matter, scheduled for July 28, 2022, is vacated. A new status conference is scheduled for September 15, 2022, at 9:30 a.m. The Court further finds, based on the representations of the parties and Defendant Hansen's request, that the ends of justice served by granting the continuance outweigh the best interests of the public and the Defendant in a speedy trial. Time shall be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(B)(iv) and Local Code T-4, to allow necessary attorney preparation taking into consideration the exercise of due diligence for the period from July 28, 2022, up to and including September 15, 2022.

IT IS SO ORDERED.

DATED: July 26, 2022



Troy L. Nunley
United States District Judge

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